

STOEL RIVES LLP

Michael B. Brown, Nevada Bar No. 6577
michael.brown@stoel.com
 10008 SE River Street
 Truckee, CA 96161
 Tel: (530) 582-2282
 Fax: (530) 582-2281

Joshua G. Gigger (Pro Hac Vice)
josh.gigger@stoel.com
 Marc T. Rasich (Pro Hac Vice)
marc.rasich@stoel.com
 201 South Main Street, Suite 1100
 Salt Lake City, UT 84111
 Tel: (801) 328-3131
 Fax: (801) 578-6999

Hunter O. Ferguson (Pro Hac Vice)
hunter.ferguson@stoel.com
 600 University Street, Suite 3600
 Seattle, WA 98101
 Tel: (206) 386-7514
 Fax: (206) 386-7500

*Counsel for Defendant
 Intermountain Health Care, Inc.*

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

MY HEALTH, INC., a Delaware corporation,
 Plaintiff,

v.

INTERMOUNTAIN HEALTH CARE, INC., a
 Utah corporation,
 Defendant.

Case No. 2:15-cv-00073-MMD-CWH

**STIPULATION FOR THIRD
 EXTENSION OF TIME TO RESPOND**

**(Third Request for Extension of this
 Deadline; Third Overall Extension
 Request)**

Current Response Deadline:
 April 30, 2015

Plaintiff My Health, Inc. (“*My Health*”) and Defendant Intermountain Health Care, Inc. (“*Intermountain*”) have stipulated to, and respectfully request that the Court enter an order providing for, a 60-day extension of the deadline for Intermountain to respond to My Health’s complaint from April 30, 2015 to June 29, 2015. This is the third stipulation and request for an extension of this deadline and the third overall request for an extension in this case. The initial

1 response deadline was February 5, 2015. Pursuant to two earlier stipulations of the parties, the
2 Court entered two previous orders extending this deadline, first to March 16, 2015 (Dkt. 10) and
3 then to April 30, 2015 (Dkt. 21).

4 After the Court granted the first and second extensions the parties have actively pursued
5 good-faith negotiations to settle this dispute. Through counsel, the parties have discussed
6 settlement terms in a series of communications and conferences, and the parties are confident that
7 a final settlement can be reached before either party or the Court expends further substantial
8 resources on the litigation of this dispute. But the parties have been unable to finalize an
9 agreement before the existing April 30 response deadline due to scheduling conflicts and the need
10 for individuals within each party to review and approve settlement terms.

11 The parties' agreed-upon third extension promotes judicial economy and ultimately the
12 interests of justice by providing additional time to facilitate settlement before the parties and
13 Court devote additional resources to the litigation of this matter. The agreed-upon extension
14 should not unduly delay the litigation of this matter and, it is expected, should enable the parties
15 to efficiently resolve this matter out of court. Accordingly, a third extension of the deadline for
16 Intermountain to respond to My Health's complaint to June 29, 2015 is warranted.

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

1 Dated: April 29, 2015

Respectfully Submitted,

2 **PIA ANDERSON DORIUS REYNARD & MOSS, STOEL RIVES LLP**
3 **LLC**

4 /s/ Joseph Pia

Joseph G. Pia (Pro Hac Vice)

5 joe.pia@padrm.com

William O. Kimball, NSBN 9301

6 bkimball@padrm.com

222 South Main Street, Suite 1830

7 Salt Lake City, Utah 84101

8 Telephone: (801) 350-9000

9 Fax: (801) 350-9010

10 *Counsel for Plaintiff My Health, Inc.*

/s/ Hunter Ferguson

Hunter O. Ferguson (Pro Hac Vice)

11 hunter.ferguson@stoel.com

600 University Street, Suite 3600

12 Seattle, WA 98101

Telephone: (206) 386-7514

13 Fax: (206) 386-7500

Michael B. Brown, Nevada Bar No. 6577

14 michael.brown@stoel.com

10008 SE River Street

15 Truckee, CA 96161

Telephone: (530) 582-2282

16 Fax: (530) 582-2281

Joshua G. Gigger (Pro Hac Vice)

17 josh.gigger@stoel.com

18 Marc T. Rasich (Pro Hac Vice)

19 marc.rasich@stoel.com

201 South Main Street, Suite 1100

21 Salt Lake City, UT 84111

22 Telephone: (801) 328-3131

23 Fax: (801) 578-6999

24 *Counsel for Defendant*

25 *Intermountain Health Care, Inc.*

26 IT IS SO ORDERED:



27 United States District Judge

28 DATED: April 29, 2015

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2015, I caused a true and correct copy of the foregoing
STIPULATION FOR THIRD EXTENSION OF TIME TO RESPOND to be served on the parties
to this matter via the Court's CM/ECF system.

/s/Hunter Ferguson
Hunter O. Ferguson